

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

ALFONSO HERNANDEZ,

Plaintiff,

vs.

NO. CIV-14-964 KG/SCY

CITY OF ALBUQUERQUE, et al.

Defendants.

**DEFENDANT'S' NOTICE OF COMPLETION OF BRIEFING**

Pursuant to the Local Civil Rules of the United States District Court for the District of New Mexico, D.N.M. LR-Civ. 7.4(e), Defendant Fitzgerald, by and through his counsel of record, Law Office of Jonlyn M. Martinez, LLC, hereby notifies the Court that briefing is complete on the Defendant Fitzgerald's First Motion to Compel Discovery and that said Motion is ready for decision on the following:

1. Defendant Fitzgerald's First Motion to Compel Discovery, filed April 14, 2015

[Document No. 28].

At the hearing held on April 30, 2015, the Plaintiff agreed to produce discovery responses to Interrogatory Nos. 13, 14 and 15. Counsel for the Plaintiff indicated she had correspondence containing all responses that would be provided. Instead, on April 30, 2015, counsel for the Plaintiff provided correspondence dated March 19, 2015. *See letter dated March 19, 2015*, attached hereto as Exhibit A. No response to the Defendant's Motion to Compel has been filed and no request for extension has been requested.

Therefore, briefing concerning Defendant Fitzgerald's First Motion to Compel Discovery is complete.

Respectfully submitted,

LAW OFFICE OF JONLYN M. MARTINEZ, LLC

By: *Electronically filed May 4, 2015*

JONLYN M. MARTINEZ  
Attorneys for Defendant Fitzgerald  
P.O. Box 1805  
Albuquerque, NM 87103-1805

I hereby certify that a true and correct copy of this pleading was served on all counsel of record via CM/ECF system on May 4, 2015:

*Electronically Filed by Jonlyn M. Martinez*